

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Carlos C Sierra <div style="text-align: center;">Debtor(s)</div> Lakeview Loan Servicing, LLC <div style="text-align: center;">Movant</div> <div style="text-align: center;">vs.</div> Carlos C Sierra <div style="text-align: center;">Respondent(s)</div>	BK NO. 24-11945 AMC Chapter 13 Hearing Date: 08/20/24
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**OBJECTION OF LAKEVIEW LOAN SERVICING, LLC
TO CONFIRMATION OF CHAPTER 13 PLAN**

Lakeview Loan Servicing, LLC (hereinafter Secured Creditor), objects to confirmation of Debtor's Chapter 13 plan and asserts in support of its Objection as follows:

1. Secured Creditor intends to file a secured proof of claim on or before the Proof of Claim bar date setting forth pre-petition arrears in the amount of \$1,961.51.
2. Debtor's Plan provides for payment in the amount of \$0.00 towards the arrearage claim of the Secured Creditor.
3. Debtor's Plan understates the amount of the Secured Creditor's claim by \$1,961.51, and does not provide sufficient funding to pay said claim including present value interest.
4. Accordingly, Debtor's Plan is not feasible, as it does not fully compensate the Secured Creditor.
5. In addition, the Debtor's Plan fails to comply with 11 U.S.C. §§ 1322 and 1325.
6. Debtor(s) is/are delinquent in plan payments to the Chapter 13 Trustee in the amount of \$.

WHEREFORE, the Secured Creditor, Lakeview Loan Servicing, LLC, prays that the Court deny confirmation of the Debtor's Plan.

Respectfully submitted,

Date: July 5, 2024

By: /s/ Denise Carlon
Denise Carlon, Esquire
KML Law Group, P.C.
The Lits Building
701 Market Street, Suite 5000
Philadelphia, PA 19106
215-627-1322
Attorney for Movant/Applicant